



**MICHELLE LUJAN GRISHAM**  
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Lieutenant Governor

**NEW MEXICO  
ENVIRONMENT DEPARTMENT**

*Surface Water Quality Bureau*  
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**JAMES KENNEY**  
Cabinet Secretary Designate

**Certified Mail – Return Receipt Requested**

January 18, 2019

Carey Slater  
Plant Manager  
American Gypsum  
4600 Paseo Del Norte NE  
Albuquerque, NM 87113

**Re: American Gypsum-Albuquerque; Multi-Sector General Permit; SIC 3275; NPDES  
Compliance Evaluation Inspection; NPDES # NMR053164; December 20, 2018**

Dear Mr. Slater:

Enclosed please find a copy of the report for the referenced inspection that the New Mexico Environment Department (NMED) conducted at your facility on behalf of the U.S. Environmental Protection Agency (USEPA). This inspection report will be sent to the USEPA in Dallas for their review. These inspections are used by USEPA to determine compliance with the National Pollutant Discharge Elimination System (NPDES) permitting program in accordance with requirements of the federal Clean Water Act.

You are encouraged to review the inspection report, required to correct any problems noted during the inspection, and advised to modify your operational and/or administrative procedures, as appropriate. If you have comments on or concerns with the basis for the findings in the NMED inspection report, please contact us (see the address below) in writing within 30 days from the date of this letter. Further, you are encouraged to notify in writing both the USEPA and NMED regarding modifications and compliance schedules at the addresses below:

Robert Houston  
Environmental Protection Agency, Region 6  
NPDES Enforcement Branch (6EN-WS)  
1445 Ross Avenue, Suite 1200  
Dallas, Texas 75202-2733

Program Manager  
New Mexico Environment Department  
Surface Water Quality Bureau (N2050)  
Point Source Regulation Section  
P.O. Box 5469  
Santa Fe, New Mexico 87502

**American Gypsum-Albuquerque; NPDES #NMR053164**

**January 18, 2019**

**Page 2 of 2**

Robert Houston (Houston.Robert@epa.gov) is the USEPA Region 6's Stormwater Enforcement Coordinator at the above address. If you have any questions about this inspection report, please contact Jennifer Foote at (505)827-0596 or at Jennifer.Foote@state.nm.us.

Sincerely,

*/s/ Sarah Holcomb*

Sarah Holcomb  
Program Manager  
Point Source Regulation Section  
Surface Water Quality Bureau

cc: Carol Peters-Wagnon, USEPA (6EN-WM) by e-mail  
Nancy Williams, USEPA (6EN-WC) by e-mail  
Amy Andrews, USEPA (6EN-WM) by e-mail  
David Esparza, USEPA (6EN-WM) by e-mail  
Robert Houston, USEPA (6EN)  
Darlene Whitten-Hill, USEPA (6EN) by e-mail  
John Rhoderick, NMED District I by e-mail  
Ray Dabria, American Gypsum by email  
Paul Gallardo, American Gypsum by email  
Jeff Engham, American Gypsum by email



Form Approved  
OMB No. 2040-0003  
Approval Expires 7-31-85

## NPDES Compliance Inspection Report

### Section A: National Data System Coding

Transaction Code	NPDES	yr/mo/day	Inspec. Type	Inspector	Fac Type
1 N 2 5 3 N M R 0 5 3 1 6 4 11 12 1 8 1 2 2 0 17 18 ~ 19 S 20 2					
Remarks					
S E C T O R E					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67 69	70 3	71 N	72 N	73	74 75 80

### Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number)	Entry Time /Date 10:10 AM/12-20-18	Permit Effective Date 6-4-2015
American Gypsum 4600 Paseo Del Norte NE Albuquerque, NM 87113 Bernalillo County	Exit Time/Date 12:56 PM/12-20-18	Permit Expiration Date 6-4-2020
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Ray Dabria/Bernalillo Environmental/Safety Manager /Ray.Dabria@americangypsum.com Paul Gallardo/Maintenance Supervisor/505346-2138 ext. 1327	Other Facility Data SIC: 3275 Gypsum Products	
Name, Address of Responsible Official/Title/Phone and Fax Number Carey Slater/Plant Manager/505-346-2138 ext. 1320 American Gypsum 4600 Paseo Del Norte NE Albuquerque, NM 8711	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Contacted	GPS: N. 35.171526 W. -106.595473

### Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S Permit	N Flow Measurement	N Operations & Maintenance	N CSO/SSO
U Records/Reports	N Self-Monitoring Program	N Sludge Handling/Disposal	N Pollution Prevention
M Facility Site Review	N Compliance Schedules	N Pretreatment	N Multimedia
N Effluent/Receiving Waters	N Laboratory	N Storm Water	N Other:

### Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

- Inspector Jennifer Foote (NMED) arrived on site, explained the purpose of the inspection and presented credentials to Mr. Paul Gallardo, Maintenance supervisor and later to Mr. Ray Dabria, Bernalillo Environmental Safety Manager. Mr. Gallardo explained that ~~the~~ Jeff Engham, the Environmental Safety Manager for this facility was on the road today, but was able to find some files in his office. He provided the SWPPP for review and the three of us toured the facility. An exit interview was conducted before the inspector departed the facility. No further documentation was received after the site visit.
- See attached sheets for further details.

Name(s) and Signature(s) of Inspector(s) Jennifer Foote /s/ Jennifer Foote	Agency/Office/Telephone/Fax NMED/SWQB 505-827-0596	Date 1/18/19
Signature of Management QA Reviewer Sarah Holcomb, Program Manager /s/ Sarah Holcomb	Agency/Office/Phone and Fax Numbers NMED/SWQB 505-827-2798	Date 1/18/19

## NPDES Industrial Storm Water Checklist (MSGP)

<u>National Database Information</u>		<u>General</u>	
Inspection Type	Compliance Evaluation	Inspector Name	Jennifer Foote
NPDES ID Number	NMR053164	Telephone	505-827-0596
Inspection Date	12/20/18	Entry Time	10:10am
Inspector Type (circle one)	<input type="checkbox"/> EPA <input checked="" type="checkbox"/> State <input type="checkbox"/> EPA Oversight	Exit Time	12:56pm
Facility Sector/ SIC/Activity Code	Sector E, Glass, Clay, Cement, Concrete and Gypsum Products SIC 3275	Signature	/s/ Jennifer Foote

<u>Facility Location Information</u>				
Name/Location/ Mailing Address	American Gypsum 4600 Paseo Del Norte NE Albuquerque, NM 87113			
GPS Coordinates	Latitude	35.171526	Longitude	-106.595473
Receiving Water(s)	Albuquerque MS4 to Rio Grande			

<u>Contact Information</u>		
	Name(s)	Telephone
Name(s) and Role(s) of All Parties Meeting the Definition of Operator	Carey Slater, Plant Manager	505-346-2138 ext. 1320
Facility Contact	Jeff Engham, Environmental Safety Manager Ray Dabria, Bernalillo Environmental Safety Manager Paul Gallardo/Maintenance Supervisor	505-346-2138 ext 1327
Authorized Official(s)	Carey Slater/Plant Manager	505-346-2138 ext. 1320

<u>Basic Permit Information</u>			<u>Basic SWPPP Information</u>		
Permit Coverage	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	SWPPP Prepared & Available	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N
Permit Type	<input checked="" type="checkbox"/> General	<input type="checkbox"/> Individual	SWPPP Contents Satisfactory	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N
Operational Date	1960		SWPPP Implementation Satisfactory	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N
NOI/Application Date	9/2/2015		SWPPP Date	October 2017	
If applicable, is no exposure certification on file?	<input type="checkbox"/> Y	<input type="checkbox"/> N <input checked="" type="checkbox"/> N/A			

## NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Review			
General		Notes:	
Was the SWPPP completed prior to NOI submission?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	SWPPs provided with cover dates of 8/21/15 and revision 10/3/17. Neither were certified. Facility stated they were currently in the process of their contractor revising their SWPPP.
Copy of the NOI and acknowledgment letter from EPA?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	Copy of E-submission webpage dated 9/28/2017 in plan. However, ICIS has NOI submitted date of 9/2/2015.
Copy of the permit language?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	
Have copies of inspection reports/all other documentation been retained as part of the SWPPP for 3 years from date permit coverage expires?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Does the SWPPP contain a signed/certified statement indicating that the site is inactive and unstaffed, and that there are no industrial materials or activities exposed to precipitation, in accordance with the substantive requirements in 40 CFR 122.26(g)(4)(iii)? Applicable to: <ul style="list-style-type: none"> <li>• Routine facility inspection (4.1.3)</li> <li>• Quarterly visual assessment (4.2.3)</li> <li>• Benchmark monitoring (6.2.1.3).</li> </ul>	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Does the SWPPP include copies of relevant parts of other documents (e.g., SPCC) referenced in the SWPPP?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	SWPP states there is a SPCC for the facility.
Does the SWPPP include documentation to support eligibility under the Endangered Species Act?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	Text states a species list was obtained from USFWS and provides a consultation code, but appendix pages were missing.
Does the SWPPP include documentation to support eligibility under the Historic Preservation Act?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	Text states that facility certified no effect under 2008 MGSP and is not constructing or installing any new stormwater measures.
Does the SWPPP include documentation to support eligibility under NEPA (New Source)?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Did all "operators" sign/certify the SWPPP?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	unsigned
Is the storm water pollution prevention team identified (name or title)?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Are the storm water pollution prevention team's responsibilities identified?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	

## NPDES Industrial Storm Water Checklist (MSGP)

<u>Site Description</u>			<b>Notes:</b>
SWPPP provides a description of the facility's industrial activities?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Is there a general location map (e.g., USGS quadrangle map) with enough detail to identify the location of the facility and all receiving waters for storm water discharges?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	
Is there a site specific site map?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the site map contain the size of the property in acres?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	
Does the site map contain the location and extent of significant structures and impervious surfaces?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	Site map is an aerial photo (see photo #1). It was unclear during the walkaround that "basin AB" was part of the facility as it is outside the fence and the fence on East side was the facility limit (photo 5). Site limits should be clearly shown on map.
Does the site map contain directions of storm water flow (indicated by arrows)?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	Does not indicate flow to storm drains, that "outfall" AB and C ponds do not discharge, or where Outfall D could discharge.
Does the site map contain locations of all existing structural control measures?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the site map contain locations of all receiving waters in the immediate vicinity of the facility, indicating if any of the waters are impaired, and if so, whether the waters have TMDLs established for them?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	Text includes information on impaired receiving waters.
Does the site map contain locations of all potential pollutants and significant materials identified under Part 5.1.3.2?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	
Does the site map contain locations where significant spills or leaks identified under Part 5.1.3.3 have occurred?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Does the site map contain locations of all storm water monitoring points?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	Potential monitoring point is not identified on map.
Does the site map contain locations of storm water inlets and outfalls, with a unique identification (e.g., 001, 002) for each outfall and if substantially identical?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	Map does not show storm drain inlets or outlets, that "outfall" AB and C ponds do not discharge, or location where Outfall D would discharge.
Does the site map contain municipal separate storm sewers and where the facility discharges to them?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Does the site map contain locations and descriptions of all non-storm water discharges?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A

## NPDES Industrial Storm Water Checklist (MSGP)

<u>Site Description</u>			<b>Notes:</b>
<p>Does the site map contain locations of the following activities where these activities are exposed to precipitation?</p> <ul style="list-style-type: none"> <li>• Fueling stations</li> <li>• Vehicle and equipment maintenance and/or cleaning areas</li> <li>• Loading/unloading areas</li> <li>• Locations used for the treatment, storage or disposal of wastes</li> <li>• Liquid storage tanks</li> <li>• Processing and storage areas</li> <li>• Immediate access roads and rail lines used or travelled by carriers of raw materials, manufactured products, waste materials, or by-products used or created by the facility</li> <li>• Transfer areas for substances in bulk</li> <li>• Machinery</li> </ul>	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	Site map is an aerial photo
Does the site map contain locations and sources of run-on to the site from adjacent property that contains significant quantities of pollutants?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Does the SWPPP document areas at the facility where industrial materials or activities are exposed to storm water and from which allowable non-storm water discharges are released?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Does the SWPPP include a list of the industrial activities exposed to storm water (e.g., material storage; equipment fueling, maintenance, and cleaning; cutting steel beams)?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	Only a general list e.g. "material storage" with "TSS and pH" as potential pollutants. Does not provide specific items or locations.
Does the SWPPP include a list of pollutants and/or pollutant constituents associated with each identified activity?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	Does not include sediment or windblown trash as potential pollutants.
Does the SWPPP include documentation of where spills and leaks occurred for three years prior to the preparation of the SWPPP?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A. SWPPP reports no significant spills or leaks have occurred.

## NPDES Industrial Storm Water Checklist (MSGP)

<u>Site Description</u>		Notes:	
Does the SWPPP include a non-storm water discharge evaluation in the SWPPP? Does it include: <ul style="list-style-type: none"> <li>Date</li> <li>Description of evaluation criteria</li> <li>List of the outfalls or onsite drainage points directly observed</li> <li>Different types of non-storm water discharges and source locations</li> <li>Actions taken such as a list of control measures for elimination.</li> </ul>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	Only states that a water recycling system is in place and was observed to be working in August 2017.
Does salt storage occur at this facility?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	
Does the SWPPP include a summary of storm water sampling data for the previous permit term?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
<u>Controls to Reduce Pollutants</u>		Notes:	
Does the SWPPP include documentation of the location and type of control measures at the facility to comply with the requirements in Part 2?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the SWPPP include documentation that selection and design of control measures were based on a consideration of the practices and procedures in Part 2.1.1?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	States SWPPP and site plan are designed to prevent most stormwater runoff from leaving the site. Does not address minimization of TSS and pH (listed potential Pollutants) in stormwater.
Does the SWPPP include measures to minimize the exposure of manufacturing, processing, and material storage areas (including loading and unloading, storage, disposal, cleaning, maintenance, and fueling operations) to rain, snow, snowmelt, and runoff by either locating these industrial materials and activities inside or protecting them with storm resistant coverings?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	SWPPP waste materials are exposed to stormwater.
Does the SWPPP include good housekeeping measures (e.g., keeping all exposed areas that are potential sources of pollutants clean, using such measures as sweeping at regular intervals, keeping materials orderly and labeled, and storing materials in appropriate containers)?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	SWPPP states shoveling and sweeping are performed on a regular basis. Does not specify minimum of weekly as required under 8.E.2.1: <i>Indicate in your SWPPP the frequency of sweeping, vacuuming or other equivalent measures. Determine the frequency based on the amount of industrial activity occurring in the area and the frequency of precipitation, but it must be performed at least once a week in areas where cement, aggregate, kiln dust, fly ash or settled dust are being handled or processed and may be discharged in stormwater.</i>



## NPDES Industrial Storm Water Checklist (MSGP)

<b><u>Controls to Reduce Pollutants</u></b>			<b>Notes:</b>
Does the SWPPP include a schedule for pickup and disposal of wastes and routine inspections of tanks and drums?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	
Does the SWPPP include preventative maintenance procedures, including regular inspections, testing, maintenance, and repair of all industrial equipment and systems, and control measures, and back-up practices should a runoff event occur while a control measure is off-line?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	No back up practices for if a berm is damaged.
Does the SWPPP include a schedule for preventative maintenance procedures?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	"regular"
Does the SWPPP include procedures for minimizing the potential for leaks, spills and other releases that may be exposed to storm water and develop plans for effective response to such spills if or when they occur?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the facility implement procedures for plainly labeling containers (e.g., "Used Oil," "Spent Solvents," "Fertilizers and Pesticides," etc.) that could be susceptible to spillage or leakage to encourage proper handling and facilitate rapid response if spills or leaks occur?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the facility implement preventative measures such as barriers between material storage and traffic areas, secondary containment provisions, and procedures for material storage and handling?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	Secondary containment has been installed at vehicle maintenance area
Does the facility implement procedures for expeditiously stopping, containing, and cleaning up leaks, spills, and other releases?	<input type="checkbox"/> Y	<input type="checkbox"/> N	n/a SWPPP states no spills have occurred
Does the facility train employees who may cause, detect, or respond to a spill or leak in these procedures and have necessary spill response equipment available?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	Documentation for training was provided for 11 employees on 6-6-18. Documentation for previous training was not available.
Does the facility document and follow procedures for notification of appropriate facility personnel, emergency response agencies, and regulatory agencies?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A

## NPDES Industrial Storm Water Checklist (MSGP)

<b>Controls to Reduce Pollutants</b>			<b>Notes:</b>
Does the SWPPP document erosion and sediment controls?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	Plan states all materials are stored on impervious surfaces. However, most materials appear to be stored on dirt surfaces (photos 1,5).
Does the facility stabilize exposed areas and contain runoff using structural and/or non-structural control measures to minimize onsite erosion and sedimentation, and the resulting discharge of pollutants?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the facility place flow velocity dissipation devices at discharge locations and within outfall channels where necessary to reduce erosion and/or settle out pollutants?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
If the facility stores salt at this facility, are the piles enclosed or covered? Does the facility implement appropriate measures (e.g., good housekeeping, diversions, containment) to minimize exposure resulting from adding to or removing materials from the pile?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Employee Training – is there a schedule for regular (at least annually) employee training?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	yes
Does training cover both the specific control measures used to achieve the effluent limits in Part 2 and monitoring, inspection, planning, reporting, and documentation requirements in other parts of the permit?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	Unclear if training includes site specific information on controls.
Does the facility ensure that waste, garbage, and floatable debris are not discharged to receiving waters by keeping exposed areas free of such materials or by intercepting them before they are discharged?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	Photo 2, 3, 5
Does the facility minimize generation of dust and off-site tracking of raw, final, or waste materials?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	It appears that dust generation is well controlled, however, aerial photos show tracking at the entrance. Photo 7
Has the facility eliminated non-storm water discharges not authorized by an NPDES permit?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A

## NPDES Industrial Storm Water Checklist (MSGP)

Inspections (Part 4)			
<u>General</u>	Notes:		
<b>Routine Facility Inspections</b>			
Are routine facility inspections conducted at least quarterly while facility operating?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	
Are inspections documented, including: <ul style="list-style-type: none"> <li>Date and time</li> <li>Name and signature of inspector</li> <li>Weather information and a description of discharge occurring at the time of the inspection</li> <li>Previously unidentified discharges from site</li> <li>Control measures needing maintenance or repairs</li> <li>Failed control measures that need replacement</li> <li>Incidents of noncompliance observed</li> <li>Additional control measures needed.</li> </ul>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	A table listing annual inspections, and two completed monthly inspections (7/28/18 and 8/28/18) were the only records available.
Exceptions, including (see 4.1.3): <ul style="list-style-type: none"> <li>Inactive and unstaffed sites</li> </ul>	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
<b>Quarterly Visual Assessment</b>			
Are quarterly visual assessments conducted?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	SWPPP states facility has not discharged stormwater.
Does the assessment consist of a sample collected: <ul style="list-style-type: none"> <li>Within the first 30 minutes of discharge</li> <li>On discharges that occur at least 72 hours (3 days) from the previous discharge</li> <li>Collected in a clean, clear glass or plastic container.</li> </ul>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	

## NPDES Industrial Storm Water Checklist (MSGP)

Inspections			
Are assessments documented, including: <ul style="list-style-type: none"> <li>• Sample location</li> <li>• Sample collection date/time &amp; visual assessment date/time</li> <li>• Personnel collecting sample &amp; performing assessment and their signature</li> <li>• Nature of the discharge (runoff or snowmelt)</li> <li>• Results of observations (including color, odor, clarity, floating solids, settled solids, suspended solids, foam, oil sheen and other obvious indicators)</li> <li>• Probable sources of contamination</li> <li>• If applicable, reason for not taking samples within 1<sup>st</sup> 30 minutes.</li> </ul>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	SWPPP states facility will collect a stormwater sample from each "outfall" located on the map.  General procedures are described in plan, though locations and how the sample would be collected are unclear.
Exceptions, including: <ul style="list-style-type: none"> <li>• Adverse weather conditions</li> <li>• Climates with irregular storm water runoff</li> <li>• Areas subject to snow</li> <li>• Substantially identical outfalls</li> <li>• Inactive and unstaffed sites.</li> </ul>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	Documentation of non-discharge not documented on quarterly reports.
<b>Comprehensive Site Inspections</b>			
Are comprehensive site inspections conducted annually (start 9/29/08)?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A- Per 2015 permit requirements, now incorporated in routine facility inspection
Conducted by qualified personnel including at least one member of the storm water pollution prevention team?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Cover all areas of the facility?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Include a review of monitoring data? Do inspectors consider the results of the past year's visual and analytical monitoring when planning and conducting inspections?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A

## NPDES Industrial Storm Water Checklist (MSGP)

Inspections			
<p>Include observations of the following:</p> <ul style="list-style-type: none"> <li>Industrial materials, residue, or trash that may have or could come into contact with storm water</li> <li>Leaks or spills from industrial equipment, drums, tanks, and other containers</li> <li>Offsite tracking of industrial or waste materials, or sediment where vehicles enter or exit the site</li> <li>Tracking or blowing of raw, final, or waste materials from areas of no exposure to exposed areas</li> <li>Control measures needing replacement, maintenance, or repair</li> <li>All storm water control measures observed.</li> </ul>	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
<p>Are inspections documented, including:</p> <ul style="list-style-type: none"> <li>Date of inspection</li> <li>Names and titles of personnel making the inspection</li> <li>Findings from examination of areas of facility from Part 4.3.1</li> <li>All observations relating to implementation of control measures</li> <li>Any required revisions to the SWPPP resulting from inspection</li> <li>Any incidents of noncompliance identified OR certification that facility is in compliance with the permit</li> <li>A statement signed in accordance with Appendix B, Subsection 11</li> </ul>	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A

## NPDES Industrial Storm Water Checklist (MSGP)

Monitoring (Part 6)			
<u>General</u>	Notes:		
Does the SWPPP contain a procedure for conducting sector (and co-located) specific benchmark monitoring?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the SWPPP contain procedures for conducting effluent limitations guidelines monitoring?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Does the SWPPP contain a procedure for other monitoring (state or tribal specific; impaired waters; other as required)	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Are samples analyzed in accordance with 40 CFR Part 136 methods?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
<b>Benchmark Monitoring</b>			
Does the monitoring consist of a sample collected: <ul style="list-style-type: none"> <li>• Within the first 30 minutes of discharge</li> <li>• On discharges that occur at least 72 hours (3 days) from the previous discharge</li> <li>• Document the date and duration (in hours) of the rainfall event, rainfall total (snow - date only) for that rainfall</li> <li>• Prior to commingling.</li> </ul>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	Facility states it has not discharged.
Is monitoring conducted during each of the first four full quarterly (calendar) monitoring periods following permit coverage?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	
Is the average of the first four quarterly samples < the parameter benchmark?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A

## NPDES Industrial Storm Water Checklist (MSGP)

Monitoring			
<p>Is the average of the first four quarterly samples &gt; the parameter benchmark?</p> <ul style="list-style-type: none"> <li>• Make the necessary modifications</li> <li>• Continue quarterly monitoring</li> <li>• Determine and document that no further pollutant reductions are technologically available and economically practicable and achievable, continue monitoring once per year, notify EPA</li> <li>• Natural background pollutant level documentation</li> </ul>	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
<p>Exceptions, including (see 6.1 &amp; 6.2):</p> <ul style="list-style-type: none"> <li>• Adverse weather conditions</li> <li>• Climates with irregular storm water runoff</li> <li>• Snowmelt</li> <li>• Substantially identical outfalls (per 5.1.5.2)</li> <li>• Inactive and unstaffed sites.</li> </ul>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<p>Exceptions for no discharge have not been documented.</p> <p>Substantially identical outfalls are described in plan incorrectly. The one that will be sampled is not identified and 3 of the 4 outfalls do not discharge but are ponds. Specific information listed in 5.2.5.3 is not included, SWPPP only states "they are exposed to the same industrial activities, have the same control measures implemented in their drainage areas, and have the same potential contributors of pollutants to stormwater discharges. The runoff coefficient for each of these areas is medium(between 40 and 65%)."</p>
Effluent Limitations Monitoring			
Sampled once per year?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Follow-up requirements if discharge exceeds effluent limit (see 6.3)?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Other Required Monitoring			
<ul style="list-style-type: none"> <li>• State or Tribal provisions</li> <li>• Discharges to impaired waters</li> <li>• Additional monitoring required by EPA.</li> </ul>	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Reporting (Part 7)			
Is monitoring data reported to EPA within 30 days of receiving analytical results for the monitoring period?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	Mr. Dabria stated that they had recently had an internal audit done and had determined that the quarterly DMRs needed to be submitted (as no discharge). They were having difficulty getting registered in the CDX system. The inspector stated that they would need to submit all back DMRs to the start of the permit period.
Is the annual report submitted by 45 days after conducting the comprehensive site inspection?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	Annual reports submitted 6/10/2016, 1/26/17 and 1/31/2018. Annual report incorrectly includes information on routine facility inspections in the stormwater quarterly visual assessment section.
If follow-up effluent limitations monitoring results exceed numeric limits, was a report submitted to	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A

## NPDES Industrial Storm Water Checklist (MSGP)

EPA no later than 30 days after results were received?			
<b>SWPPP Implementation</b>			
<b>Measures to minimize the exposure of manufacturing, processing, and material storage areas (including loading and unloading, storage, disposal, cleaning, maintenance, and fueling operations) to rain, snow, snowmelt, and runoff</b>	<p><i>(e.g., either locating these industrial materials and activities inside or protecting them with storm resistant coverings. Unless infeasible, you must also: Use grading, berming or curbing to prevent runoff of contaminated flows and divert run-on away from these areas; Locate materials, equipment, and activities so that potential leaks and spills are contained or able to be contained or diverted before discharge; Clean up spills and leaks promptly using dry methods (e.g., absorbents) to prevent the discharge of pollutants; Store leaky vehicles and equipment indoors or, if stored outdoors, use drip pans and absorbents; Use spill/overflow protection equipment; Perform all vehicle and/or equipment cleaning operations indoors, under cover, or in bermed areas that prevent runoff and run-on and also that capture any overspray; and Drain fluids from equipment and vehicles that will be decommissioned, and, for any equipment and vehicles that will remain unused for extended periods of time, inspect at least monthly for leaks.</i></p> <p>Many recycling materials are stored outdoors as well as metals. Vehicle maintenance occurs in a paved area with secondary containment.</p> <p>Waste bins are not covered.(Photo 2)</p>		
<b>Good Housekeeping</b>	<p><i>(e.g., Sweep or vacuum at regular intervals or, alternatively, wash down the area and collect and/or treat, and properly dispose of the washdown water; Store materials in appropriate containers)</i></p> <p>Storm drain near liquid storage tanks on east side of facility is kept locked closed and opened if no spill occurs. Storm drain also receives runoff from wet gypsum waste, SWPP does not include information on storm drain and what materials may enter it, or if water is tested for pH or other contaminants before release (Photo 2+3). Water flows to retention pond at outfall D and does not normally discharge.</p>		
<b>Preventative maintenance</b>	<p><i>(e.g., regular inspections, testing, maintenance, and repair of all industrial equipment and systems, and control measures, and back-up practices should a runoff event occur while a control measure is off-line)</i></p> <p>Plan states facility performs monthly walk arounds, drainage channel to Outfall D Pond had tumbleweeds blocking it which could lead to an unexpected discharge out the outfall. (photo 6).</p>		



## NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Implementation	
<b>Spill Prevention and Response</b>	<p><i>(e.g., minimizing the potential for leaks, spills and other releases that may be exposed to storm water and develop plans for effective response to such spills if or when they occur)</i></p> <p>Vehicle maintenance occurs in area that drains to secondary containment area.</p>
<b>Erosion and Sediment Controls</b>	<p><i>(e.g., stabilize exposed areas and contain runoff using structural and/or non-structural control measures to minimize onsite erosion and sedimentation, flow velocity dissipation devices at discharge locations and within outfall channels)</i></p> <p>There was one location of significant run-on erosion from the east side of the facility(photo4), the rest of the facility is fairly flat and erosion was not noted.</p>
<b>Management of Runoff</b>	<p><i>(e.g., divert, infiltrate, reuse, contain, or otherwise reduce storm water runoff, to minimize pollutants in discharges)</i></p> <p>SWPP Plan states that SWPPP Plan and site map are designed to prevent discharge. There is no information on what capacity or size storm the retention ponds were designed for and what size storm would cause the outfall on the northside to discharge.</p>
<b>Salt Storage Piles</b>	<p><i>(e.g., enclose or cover piles appropriate measures (e.g., good housekeeping, diversions, containment) to minimize exposure resulting from adding to or removing materials from the pile)</i></p> <p>N/A</p>

## NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Implementation	
<b>Waste, Garbage and Floatable Debris</b>	<p><i>(e.g., Keep all dumpster lids closed when not in use. For dumpsters and roll off boxes that do not have lids and could leak, ensure that discharges have a control (Minimize the potential for waste, garbage and floatable debris to be discharged by keeping exposed areas free of such materials, or by intercepting them before they are discharged)</i></p> <p>Windblown and floatable debris were present (photo 2, 3, 4,5).</p>
<b>Evidence of non-storm water discharges</b>	<p>No non-stormwater discharges were observed on the day of the inspection. There were signs of wet material recycle leakage from a door and dumpster adjacent to a storm drain. (photo 2,3)</p>
<b>Dust Generation and Vehicle Tracking of Industrial Materials</b>	<p><i>(minimize generation of dust and off-site tracking of raw, final, or waste materials)</i></p> <p>Google earth shows tracking from the facility (photo 7), however, that area drains to retention ponds.</p>

**NMED/SWQB  
Official Photograph Log  
Photo # 1**

Photographer: Jennifer Foote

Date: 12/20/18

Time: 10:31am

City/County: Albuquerque/ Bernalillo County

State: New Mexico

Location: American Gypsum- Albuquerque

Subject: SWPP site map

Stormwater Pollution Prevention Plan

American Gypsum (Albuquerque)

Stormwater Pollution Prevention Plan

American Gypsum (Albuquerque)

## 1.6 Site map



**NMED/SWQB  
Official Photograph Log  
Photo # 2**

Photographer: Jennifer Foote

Date: 12/20/18

Time: 11:47am

City/County: Albuquerque/ Bernalillo County

State: New Mexico

Location: American Gypsum- Albuquerque

Subject: dumpster with liquid stains adjacent to storm drain



**NMED/SWQB  
Official Photograph Log  
Photo # 3**

Photographer: Jennifer Foote

Date: 12/20/18

Time: 11:47am

City/County: Albuquerque/ Bernalillo County

State: New Mexico

Location: American Gypsum- Albuquerque

Subject: locked storm drain adjacent to liquid drum storage





**NMED/SWQB  
Official Photograph Log  
Photo # 4**

Photographer: Jennifer Foote	Date: 12/20/18	Time: 11:53 am
City/County: Albuquerque/ Bernalillo County		State: New Mexico
Location: American Gypsum- Albuquerque		
Subject: erosion from run-on on east side of facility		



**NMED/SWQB  
Official Photograph Log  
Photo # 5**

Photographer: Jennifer Foote	Date: 12/20/18	Time: 11:56 am
City/County: Albuquerque/ Bernalillo County		State: New Mexico
Location: American Gypsum- Albuquerque		
Subject: drainage swale to west with windblown trash. However, drains to basin AB and does not discharge from larger site limits		



**NMED/SWQB  
Official Photograph Log  
Photo # 6**

Photographer: Jennifer Foote	Date: 12/20/18	Time: 12:11 pm
City/County: Albuquerque/ Bernalillo County		State: New Mexico
Location: American Gypsum- Albuquerque		
Subject: "outfall D" channel looking west towards outfall break in berm		



**NMED/SWQB  
Official Photograph Log  
Photo # 7**

Photographer: Google Earth	Date: 2/25/18	Time: n/a
City/County: Albuquerque/ Bernalillo County	State: New Mexico	
Location: American Gypsum- Albuquerque		
Subject: Aerial view showing tracking out of front gate		



## **Attachment 1**

### **Response to Inspection**





**VIA EMAIL: Jennifer.Foote@state.nm.us**

February 18, 2019

Ms. Jennifer Foote  
Industrial and Stormwater Team Supervisor  
Point Source Regulation Section  
Surface Water Quality Bureau  
New Mexico Environment Department (NMED)

*Re: Response to NMED Compliance Evaluation Inspection Letter Dated January 18, 2019  
American Gypsum Company, LLC – Albuquerque Plant  
Multi-Sector General Permit; SIC 3275  
NPDES Compliance Evaluation Inspection NPDES # NMR053164; December 20, 2018*

Dear Ms. Foote,

On December 20, 2018, NMED conducted a Compliance Evaluation Inspection at the American Gypsum Company, LLC (American Gypsum) Albuquerque Plant located at 4600 Paseo Del Norte NE, Albuquerque, NM 87113. On January 19, 2019, NMED issued a letter that included an inspection report. Based on this letter, American Gypsum is encouraged to notify in writing both the USEPA and NMED regarding modifications and compliance schedules based on the inspection report.

With this letter, American Gypsum is providing a status update on the modifications and compliance schedules. The document included in Attachment 1 of this letter details the action items and responses to NMED's inspection comments. As shown in this document, there are several action items that are currently in progress. American Gypsum will submit a second status update letter to USEPA and NMED upon completion of the remaining action items. At this time, American Gypsum expects the second status update letter be submitted within three months from the date of this submittal. The updated Stormwater Pollution Prevention Plan (SWPPP) is included with this letter as Attachment 2. The compliance records are kept onsite in hard copy format.

Based on a phone conversation between you and Trinity Consultants on February 11, 2019, this letter is being submitted to you and Mr. Robert Houston at EPA Region 6 via email, as requested.

Thank you for your assistance in this matter. If you have any questions or comments about the information presented in this letter, please do not hesitate to contact me at (505) 771-4721 or Ms. Lele Bao, P.E. with Trinity Consultants at (972) 661-8100.

Sincerely,  
AMERICAN GYPSUM COMPANY, LLC

Ray Dabria  
Mine Superintendent

Attachments

cc: Mr. Robert Houston, USEPA (6EN), via email Houston.Robert@epa.gov